

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 1:19-cv-12551 FDS

**DECLARATION OF JAY RAPAPORT IN SUPPORT OF DEFENDANT
GOOGLE LLC'S SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF**

I, Jay Rapaport, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice *pro hac vice* before this Court. I am an attorney at the law firm of Keker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.
2. I make this declaration in support of Google’s Supplemental Claim Construction Brief. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.
3. Attached as **Exhibit A** is a true and correct copy of excerpts of the deposition transcript of Sunil Khatri, Ph.D, dated March 12, 2021.
4. Attached as **Exhibit B** is a true and correct copy of excerpts of a transcript of a YouTube video of a presentation by the asserted patents’ named inventor, Joseph Bates, titled Practical Approximate Computing at the University of California, Berkeley and dated March 2016.
5. Attached as **Exhibit C** is a true and correct copy of excerpts of Patent Owner Singular’s Preliminary Response in Case No. IPR2021-00178 before the Patent Trial and Appeal Board, dated February 24, 2021.
6. Attached as **Exhibit D** is a true and correct copy of excerpts of the Declaration of Sunil Khatri, Ph.D in support of Patent Owner Singular’s Preliminary Response in Case No. IPR2021-00178 before the Patent Trial and Appeal Board, dated February 24, 2021.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct and that this declaration was executed March 15, 2021, at San Francisco, California.

/s/ Jay Rapaport
Jay Rapaport